

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WAYNE A. REED, individually and as
husband and next of kin of decedent, DIANA E.
REED,

Plaintiff,

v.

UNIFIRST CORPORATION, A/D/B/A
UNICLEAN CLEANROOM SERVICES,
SAINT THOMAS OUTPATIENT
NEUROSURGICAL CENTER, LLC,
HOWELL ALLEN CLINIC A
PROFESSIONAL CORPORATION, JOHN
CULCLASURE, M.D., DEBRA
SCHAMBERG, R.N., SAINT THOMAS
WEST HOSPITAL formerly known as
ST. THOMAS HOSPITAL, SAINT THOMAS
NETWORK and SAINT THOMAS HEALTH,

Defendants.

CIVIL ACTION NO. 1:13-cv-12656

MDL No. 2419

Master Docket No.: 1:13-md-2419-RWZ

Honorable Rya W. Zobel

DECLARATION OF WAYNE REED

Wayne Reed declares, under penalty of perjury on the date identified below, as follows:

1. My wife, Diana Reed, died on October 3, 2012 of fungal meningitis. We were married for 36 years before her death. She was 56 years old.

2. In 1988, I was diagnosed with Amyotrophic lateral sclerosis (“ALS”), also known as Lou Gehrig’s disease. As a result of that neurological disorder, I am wheelchair bound, and require substantial care and assistance.

3. Before her death, Diana was my primary caregiver. I depended on Diana to help me with daily activities including showering, dressing, preparing meals, and communicating with others. In addition, Diana’s earnings were an important part of our household income.

4. Diana developed disk problems in her neck in 2012. She sought treatment for those neck problems at Saint Thomas Outpatient Neurosurgical Center (“Saint Thomas Clinic”) in Nashville. Saint Thomas Clinic administered three epidural steroid injections to Diana in August and September of 2012.

5. After receiving the epidural steroids, Diana began suffering severe headaches, nausea and dizziness. She went to Saint Thomas Hospital and was admitted with a diagnosis of suspected fungal meningitis.

6. I stayed with Diana at her hospital bedside. After suffering tremendously in the hospital for several days, Diana suffered a stroke. She became non-responsive. She was pronounced dead on October 3, 2012. Her Death Certificate lists “fungal meningitis” as her cause of death.

7. I now live alone. Day-to-day life is an enormous struggle without the assistance of my wife. Since Diana’s death, I have depleted our modest savings and I have opened a line of credit to cover daily expenses. I require substantial daily assistance, and I rely heavily upon the generosity of friends from my church in order to survive.

8. ALS is a degenerative disease. As a result, my health is precarious. I have been hospitalized on numerous occasions in order to treat orthopedic problems secondary to my ALS.

9. In addition to affecting my ability to walk and move, the disease affects my vocal chords. My ability to speak is deteriorating.

10. I am concerned that I will lose the ability to testify before my case is heard. At some point, I will lose my ability to testify, either because of my deteriorating vocal abilities or because of other health problems associated with my degenerative disease.

Executed on this 21st day of May, 2015, in Nashville, Tennessee



Wayne Reed